




SIGNED THIS 20th day of February, 2024

THIS ORDER HAS BEEN ENTERED ON THE DOCKET.
PLEASE SEE DOCKET FOR ENTRY DATE.


Rebecca B. Connelly
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

TOMMY DEWAYNE DOBSON
ANNE CHRISTINE DOBSON,

Chapter 11
Case No. 23-60148

Debtors.

-----/
TERRY LYNN,

Plaintiff,

v.

TOMMY DEWAYNE DOBSON
ANNE CHRISTINE DOBSON,

Adversary Proceeding
Case No. 23-06013
Chapter 11

Defendants.
-----/

**STIPULATION AND ORDER
RESOLVING ADVERSARY PROCEEDING**

NOW COME the Defendants, Tommy Dewayne Dobson and Anne Christine Dobson
(hereinafter "Dobsons") and the Plaintiff, Terry Lynn (hereinafter "Ms. Lynn") (individually each is a

“Party” and collectively, they are the “Parties”), by and through their respective undersigned counsel, and hereby submit this stipulation and order resolving this Adversary Proceeding No. 23-06013 (the “Stipulated Order”), and respectfully state as follows in support thereof:

WHEREAS, on February 7, 2023 (the “Petition Date”), Dobsons filed a voluntary petition under chapter 11, subchapter V, of the Bankruptcy Code in this United States Bankruptcy Court for the Western District of Virginia;

WHEREAS, the Dobsons identified Ms. Lynn as a disputed, contingent, unliquidated creditor on their Schedule E/F as filed with the Court on February 28, 2023, and as thereafter amended;

WHEREAS, Ms. Lynn filed general unsecured Proof of Claim No. 10 (the “Claim” or “Ms. Lynn’s Claim”) in the amount of \$575,000.00 on March 9, 2023;

WHEREAS, on May 4, 2023, Ms. Lynn filed her Complaint to Determine Dischargeability of Debt (the “Complaint” or “Ms. Lynn’s Complaint”);

WHEREAS, on December 22, 2023, this Court entered its Order Confirming Debtors’ Plan of Reorganization Under 11 U.S.C. § 1191(b);

WHEREAS, no objection has been filed to Ms. Lynn’s Claim as of the date of the submission to the Court of this Stipulated Order for its consideration; and

WHEREAS, the Dobsons and Ms. Lynn have conferred and engaged in settlement discussions.

WHEREAS, the Parties have reached terms to settle this Adversary Proceeding, subject to the approval of the Court;

WHEREAS, Samuel D. Craig, III (“Mr. Craig”) has offered to pay the amount contemplated to be paid to Ms. Lynn as part of the Parties’ proposed settlement, \$45,000.00 (the

“Settlement Payment”), and Mr. Craig has deposited the Settlement Payment to the trust account of the Dobsons’ counsel to be held in escrow pending the entry of this Stipulated Order;

WHEREAS, Mr. Craig has assisted the Dobsons financially through other payments made on their behalf to third parties as well as to counsel for the Dobsons, and as the owner of the entity that employs the Dobsons, all as disclosed and described in the Declaration in Support of Application to Retain and Employ Cox Law Group, as well as the first and second supplements thereto filed at Docket Entry Nos. 17, 90, and 200 in the Dobsons’ chapter 11 case number 23-60148;

WHEREAS, such Settlement Payment is solely from Mr. Craig and not from property of the estate;

WHEREAS, the Dobsons are not obligated to repay Mr. Craig for such Settlement Payment;

NOW, for the reasons set forth herein, the Parties agree and stipulate as follows:

1. Counsel for the Dobsons shall pay to Ms. Lynn the Settlement Payment within 7 days of the entry of this Stipulated Order by the Court.

2. Ms. Lynn’s Claim, originally filed as Proof of Claim No. 10 in the amount of \$575,000.00 on March 9, 2023, is reduced by the Settlement Payment to \$530,000.00, and the Dobsons waive any objection to Ms. Lynn’s Claim as reduced.

3. Nothing contained herein can or shall be construed as an adjudication on the merits of any claims or defense that the Parties may have against each other or any other party, or as an admission or acknowledgement of any claim or defense as against the other, with all such claims and defenses preserved. Without limiting the foregoing, the Dobsons specifically deny any and all claims of fraud, misrepresentation, deceit, false pretenses, false representation,

conversion, or any other alleged wrongdoing, but nonetheless have agreed to resolve Ms. Lynn's Complaint by agreeing to the settlement terms herein in order to conclude the matters in dispute.

THEREFORE, IT IS SO ORDERED.

IT IS FURTHER ORDERED that the above-captioned adversary proceeding is RESOLVED and the Clerk may close this Adversary Proceeding.

END OF ORDER

WE ASK FOR THIS:

/s/ David Cox

David Cox (VSB No. 38670)

COX LAW GROUP, PLLC

900 Lakeside Drive

Lynchburg, VA 24501

Telephone: 434-845-2600

Facsimile: 434-845-0727

Email: david@coxlawgroup.com

Counsel for the Defendants, Tommy Dewayne Dobson and Anne Christine Dobson

/s/ Terry Lynn

Terry Lynn, Esq. (VSB # 39926)

Law Offices of Terry Lynn PLLC

695 Bent Oaks Drive

P.O. Box 374

Earlysville, Virginia 22936

Phone: (434) 964-9152

Fax: (434) 964-9275

terry@terrylynnlaw.com

Counsel for Terry Lynn